

December 20, 2016

Delivery Via Email

Mr. Jae Lee U.S. Environmental Protection Agency Region 5 77 West Jackson Boulevard Mail Code LR-8J Chicago, Illinois 60604

Re: CBI Request

Tradebe Treatment and Recycling, LLC

East Chicago, Indiana

EPA ID Number: IND000 646 943

Dear Mr. Lee:

I am writing to follow up on our discussions of Friday, December 16, 2016, during which I requested that the U.S. Environmental Protection Agency, Region 5's (USEPA), Request for Information letter, dated December 15, 2016 (hereinafter "RFI") be maintained as Confidential Business Information ("CBI"). During this conversation I was asked by the USEPA to identify the questions that should be kept as confidential and provide an explanation as to why the selected questions below, themselves should be deemed CBI.

USEPA's Requests arise out of or are derived from information submitted to Region 5 on October 18, 2016 as CBI. Information contained in Region 5's December 15, 2016 also creates an exposure of Tradebe trade secrets. As stated in the CBI, Tradebe operates in a highly competitive field in which outside access to information regarding its processes, operations, and efficiency to manage the flow of material could place Tradebe at a disadvantage with competitors. Therefore Tradebe has determined the following Requested items should be managed under CBI.

- Requests 1 through 6, and 22 are associated with Item 4.a. SDS Mass Balance Information.
- Requests 9 through 15, 17, 19 and 20 enter into the confidentiality of the design, engineering and operations of SDS.
- Requests 23 and 25 are associated with Tradebe's CBI item response 4.b. Process Water Information.

December 20, 2016 Page 2

The October 18th submission to USEPA from Tradebe included a letter, dated October 11th, to the Indiana Department of Environmental Protection and provides the explanation for the confidentiality request. Therefore, Tradebe requests that to the extent the Requests contain commentary, summary of information or discussion derived from the information submitted on October 18, 2016 as CBI, said Requests themselves are deemed CBI.

Upon your review of this request, please feel free to contact me at 219 -746-8713 or email me at tita.lagrimas@tradebe.com.

Respectfully,

Tita Lagrimas

Executive Vice President of Regulatory Affairs

cc: Mary Setnicar